

EXHIBIT AP

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE: TERRORIST :
ATTACKS ON : 03-MDL-1570
SEPTEMBER 11, 2001 : (GBD) (SN)

- - -

Wednesday, October 23, 2019

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Videotaped deposition of SALEH AL
WOHAIBI, Ph.D., Individually and as 30(b)(6)
designee for World Assembly of Muslim Youth,
taken pursuant to notice, was held at the NH
Collection Madrid Abascal Hotel, Calle de Jose'
Abascal, 47, 28003 Madrid, Spain, beginning at
9:37 a.m., on the above date, before Lisa V.
Feissner, RDR, CRR, Notary Public.

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1 received an annual grant/funding check from the
2 government of Saudi Arabia in each year between
3 1995 through 2002. Do you know if that
4 happened?

5 A. (In English.) Yes.

6 (Through interpreter.) Yes.

7 INTERPRETER: Shall I translate?

8 MR. CARTER: No, I think we're
9 okay. Yes, I understand.

10 Q. And so there would have been some
11 documents associated with that annual transfer
12 for each year?

13 A. Correct.

14 Q. Can you think of any reason why
15 WAMY would have provided Plaintiffs with
16 documents for only some of those but not for
17 others?

18 INTERPRETER: "Those years," you
19 mean?

20 MR. CARTER: Yes.

21 A. No.

22 Q. You would expect that the documents
23 would exist, correct?

24 A. We gave all the documents we have.

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1 **examples of such contributions, correct?**

2 MR. SHEN: Objection to form.

3 A. Correct.

4 Q. And in particular, in paragraph 4,
5 he says that WAMY did receive two grants of
6 100,000 Saudi riyals from the Saudi Ministry of
7 Finance upon the recommendation of the Supreme
8 Council for Islamic Affairs, correct?

9 A. Correct, but it's from the Supreme
10 Council for Islamic Affairs.

11 Q. And are those the two examples of
12 funding received from the Saudi government
13 other than the annual grant you referenced
14 earlier?

15 A. Correct.

16 Q. And are you familiar with the role
17 of the Supreme Council for Islamic Affairs
18 during this time period?

19 MR. GOETZ: Objection, scope.

20 A. The main role of the Supreme
21 Council is to receive -- it receives the
22 requests from Islamic organizations. It
23 studies these requests and decides whether it
24 recommends donations or not to these

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1 organizations.

2 Q. Other than the two donations from
3 the Supreme Council described in Mr. Abu Unuq's
4 declaration, are you aware of any other
5 instances in which the government provided a
6 contribution to WAMY separate from the annual
7 grant between 1992 and 2002?

8 A. I do not remember such thing.

9 (Exhibit Wohaibi-321 marked for
10 identification and attached to the
11 transcript.)

12 BY MR. CARTER:

13 Q. I've marked as Exhibit 321 a
14 document produced by WAMY-Saudi Arabia at
15 1248793. And there's an English translation
16 and the original Arabic.

17 Dr. Al Wohaibi, is this a letter
18 that you sent?

19 A. Yes.

20 Q. And this was directed to the
21 Minister of Islamic Affairs, correct?

22 A. Correct.

23 Q. And it is acknowledging receipt of
24 a letter from the Minister of Islamic Affairs

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1 enclosing a check in the amount of 400,000
2 Saudi riyals from the Custodian of the Two Holy
3 Mosques, correct?

4 A. Correct.

5 Q. And that donation was to support a
6 program for providing meals to the fasting
7 people during Ramadan, correct?

8 A. Correct.

9 Q. And was this a contribution to WAMY
10 from the Saudi government?

11 A. No.

12 Q. Was this a contribution from the
13 King?

14 A. Yes, from King Fahd.

15 Q. And were there other instances
16 between 1992 through 2002 in which the King
17 made a contribution to WAMY?

18 MR. SHEN: Objection to form;
19 objection to scope.

20 Which topic are you on?

21 MR. MALONEY: Financing --

22 MR. CARTER: Funding.

23 MR. SHEN: By who?

24 MR. CARTER: Funding by the

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1 government.

2 MR. SHEN: You're asking about the
3 King in his capacity --

4 MR. CARTER: Yeah, well, it will be
5 a fact question for the finder of fact
6 about whether or not there's a proper
7 separation between the government and
8 the King.

9 MR. SHEN: Outside the scope.

10 MR. GOETZ: Join the objection as
11 to scope.

12 **Q. You can answer.**

13 A. Yes, we have received after these
14 years some amounts of money through the son of
15 King Fahd, Abdulaziz bin Fahd.

16 **Q. And those contributions from**
17 **Abdulaziz bin Fahd you're saying were after**
18 **2002?**

19 A. No, before 2002. And I supposed
20 that from the produced documents.

21 **Q. And were those contributions made**
22 **by Abdulaziz bin Fahd, or sent by Abdulaziz bin**
23 **Fahd on behalf of the King?**

24 MR. SHEN: Objection to form,

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1 objection to foundation, beyond the
2 scope.

3 A. Can you please reformulate the
4 question?

5 Q. You mentioned that WAMY received
6 contribution from Abdulaziz bin Fahd, correct?

7 A. Correct.

8 Q. And with regard to those
9 contribution, were the funds provided by
10 Abdulaziz bin Fahd, or was he transferring
11 funds provided by the King?

12 MR. SHEN: Objection to form;
13 objection to foundation; objection to
14 scope.

15 MR. CARTER: It's within the scope,
16 Andy. Abdulaziz bin Fahd is
17 specifically in the --

18 MR. SHEN: You're asking him about
19 whether money was transferred or
20 provided through the Prince by the King.
21 It's beyond the scope.

22 MR. CARTER: First of all, it's not
23 beyond the scope. Just because he says
24 that the money came as a personal

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1 Q. And was this money transferred to
2 WAMY pursuant to an approval in a Royal Order?

3 MR. SHEN: Objection, foundation.

4 A. Yes, according to what is
5 stipulated in this letter.

6 Q. And in the Arabic version, is there
7 a copy of the check beneath the letter?

8 A. Correct.

9 Q. And what entity issued the check?

10 A. Ministry of Finance and National
11 Economy.

12 Q. Was this a contribution to WAMY
13 from the Saudi government?

14 A. Yes, to the activities or workshops
15 mentioned here, for summer activities or
16 workshops and da'wah activities.

17 Q. And this is distinct from the
18 donations you mentioned earlier from the
19 Supreme Council for Islamic Affairs, correct?

20 A. Correct.

21 Q. Do you know what the Royal Order
22 that's referenced in this letter addressed?

23 A. I do not know.

24 (Exhibit Wohaibi-323 marked for

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1 Dr. Al Wohaibi, the text of the
2 letter indicates that it is correspondence sent
3 by Secretary General Al-Johani in 2001 to
4 Prince Abdulaziz bin Fahd, correct?

5 A. Correct.

6 Q. And in the signature line,
7 Secretary Al-Johani mentions his title is
8 Secretary General of WAMY and also indicates,
9 member of the Shura Council.

10 Do you see that?

11 A. Yes.

12 Q. Do you know what the Shura Council
13 is?

14 A. Yes.

15 Q. What is it?

16 A. It's similar to a parliament.

17 Q. And similar to the parliament of
18 the government of Saudi Arabia?

19 MR. SHEN: Objection, form.

20 A. It's similar to a parliament in
21 other countries.

22 Q. Is it a government body?

23 A. Yes.

24 Q. Do you know during what time period

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1 approval of Prince Salman bin Abdulaziz Al
2 Saud?

3 MR. SHEN: Objection, scope.

4 A. That happened twice. I do not know
5 whether it's the first time or the second time.

6 Q. And in the second to last
7 paragraph, you requested the minister
8 correspond with the Ministry of Finance
9 regarding reservation of the King Faisal
10 Conference Hall.

11 What role did you anticipate the
12 Ministry of Finance playing in this event?

13 A. The Ministry of Finance here is the
14 one responsible of the conference hall and of
15 its reservation. So it's merely an
16 administrative issue. And this hall belongs to
17 the InterContinental hotel.

18 Q. And for this particular event, who
19 paid the InterContinental for use of the hall?

20 A. There are no expenses. There are
21 meetings, and then donations. No expenses per
22 se. Or -- there are not donations but promises
23 of providing contributions.

24 Q. I think I was asking a different

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1 Q. Who determined that WAMY should
2 have a representative?

3 A. The president of WAMY.

4 Q. Who made the decision to ask the
5 president of WAMY to include?

6 A. Now, as mentioned in the letter, is
7 president of the Council of Ministers from --
8 and the reason behind that is the experience of
9 WAMY and -- of WAMY in the work in central
10 Asia.

11 Q. The initiative described to send a
12 delegation to Kazakhstan was based on an
13 approval of the presidency of Council of
14 Ministers, correct?

15 A. Correct.

16 (Exhibit Wohaibi-335 marked for
17 identification and attached to the
18 transcript.)

19 BY MR. CARTER:

20 Q. I've marked as Exhibit 385 [sic] a
21 document produced by WAMY at 1249453.

22 Dr. Al Wohaibi, this document
23 indicates that it is a communication from the
24 Ministry of Finance and National Economy to the

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1 the amount was sent to the Ministry of Islamic
2 Affairs, but the amount was not sent to WAMY
3 from the Ministry of Finance.

4 Q. I was simply asking whether or not
5 you know -- whether you know if the da'wah and
6 book and cassette program described in this
7 correspondence in Korea did take place.

8 A. I do not know.

9 (Exhibit Wohaibi-336 marked for
10 identification and attached to the
11 transcript.)

12 BY MR. CARTER:

13 Q. I've marked as 336 a document
14 produced by WAMY at 1249448.

15 Dr. Al Wohaibi, is this a letter
16 that you sent?

17 A. Yes.

18 Q. And did you send this to an
19 undersecretary at the Ministry of Islamic
20 Affairs named Dr. Tawfiq bin Abdulaziz Al
21 Sadiri?

22 A. Yes.

23 Q. And at the time you sent this, was
24 Dr. Al Sadiri the president of the foreign

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1 donations come from King Fahd either as --
2 either as donations from the Ministry of --
3 (In English.) Through.
4 (Through interpreter.) -- I'm
5 sorry, through the Ministry of Islamic Affairs
6 in his capacity as the Custodian of the Holy
7 Mosques or through the committee of research
8 and studies, and not from the Saudi government.
9 They are not grants from Saudi government.

10 Q. Do you know whether any Saudi
11 government officials ever filed affidavits in
12 the lawsuit we're here today discussing,
13 addressing whether or not contributions they
14 made in their name were personal or
15 governmental in nature?

16 MR. GOETZ: Objection, scope.

17 A. I do not know such thing.

18 Q. Mr. Shen asked you a question about
19 Prince Abdulaziz' Office for Research and
20 Studies. Do you recall that?

21 A. Yes.

22 Q. And he asked you whether or not the
23 document referred to that as a private office.
24 Do you recall that question?